



Department of Energy

Washington, DC 20585

April 5, 2001

MEMORANDUM FOR DISTRIBUTION

FROM: Steven V. Cary *Steven V. Cary*
Acting Assistant Secretary
Office of Environment, Safety and Health

SUBJECT: Federal Employee Occupational Safety and Health (FEOSH) Program
for Environment, Safety and Health (EH) Employees

Attached is the final version of our FEOSH plan document which covers EH employees. This document fulfills our responsibilities under 29 CFR 1960, and addresses specific management roles and responsibilities for assuring protection of EH employees from workplace hazards. It addresses ergonomics, electrical hazards, general office safety, and protection of EH employees from potential hazards while on official government travel status.

Consistent with statutory requirements and Departmental policy on Integrated Safety Management, line management within each organizational element, including EH, are required to develop, manage, and implement an in-house employee safety and health program. This document details a practical and common-sense FEOSH program that is tailored to the workplace hazards to which EH employees may be exposed in carrying out their principal responsibilities.

Since I also act as the Department's Designated Agency Safety and Health Official (DASHO), EH possesses additional departmental responsibilities that I have delegated to EH senior managers. The Office of Safety and Health (EH-5) has the overall responsibility to develop and coordinate safety and health policies for the Department. EH-5 is designated to consult and coordinate with other departmental elements in the development of their respective FEOSH programs. In this manner, the Department will better assure that all elements consistently apply 29 CFR 1960. Additionally, in consideration of our DASHO responsibility, it may be necessary for EH to consult or assist on specific safety and health considerations being brought forward by Federal personnel of other organizations if their management believes that resolutions could better be achieved through our efforts. The Office of Oversight (EH-2) will act as the EH clearinghouse on such outside inquiries brought forward by line management and coordinate on its followup with the appropriate departmental elements.

In an effort to assist with the institutionalization of this program, EH-5 will be available to work with you in the implementation stage during the next 3 months. The EH-FEOSH program document will be updated consistent with EH's overarching safety management expectations and roles. I believe that successful implementation of the FEOSH program for EH employees will set a good example for FEOSH programs for the rest of DOE's organizations.

Attachment



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**Federal Employee Occupational Safety and Health Program
for
Office of Environment, Safety and Health Employees**

MARCH 2001

Office of Environment, Safety and Health

**U.S. Department of Energy
Washington, D.C. 20585**

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FEOSH PROGRAM FOR ENVIRONMENT, SAFETY AND HEALTH EMPLOYEES

POLICY STATEMENT

“The Office of Environment, Safety and Health (EH) is committed to providing safe and healthful working conditions for its employees. This commitment is implemented through an effective Federal Employee Occupational Safety and Health (FEOSH) Program for EH employees that builds upon the Department's integrated safety management core functions and guiding principles. EH considers employee safety and health to be its number one priority. As such, EH develops, implements, and evaluates practices that afford optimal protection of its employees.

The FEOSH Program for EH employees is designed to be ‘owned’ and implemented by all of its managers and employees. The program’s success depends in great measure upon open and honest communication between employees and management. This team approach facilitates the recognition of existing and emerging safety and health concerns and the timely application of appropriate mitigative actions. It is critical that all EH personnel become involved in seeking and suggesting ways to improve the effectiveness of the FEOSH Program for EH employees. Our shared goal in this program is for all of us to return home to our families at the end of each workday with no work-related injury or illness.”

*Steven V. Cary
Acting Assistant Secretary
Office of Environment, Safety and Health*

1.0 PURPOSE

The purpose of this document is to describe the FEOSH Program for EH employees. This document provides all EH personnel with the information, and references to additional information, needed to understand how to provide a safe and healthful work environment.

*Note: Much of the information listed in the following pages of this document is also captured in a computer-based training program entitled “**FEOSH Orientation**” located on the FEOSH web site, Pubs and Report page at <http://tis.eh.doe.gov/feosh/>. Viewing this orientation program may provide a better understanding of the FEOSH Program for EH employees.*

2.0 BACKGROUND

EH believes that successful implementation of a FEOSH Program for EH employees requires integration into other safety and health programs and initiatives, as well as the full inclusion and integration of safety and health into the totality of work, such that it is an integral part of the whole, not a stand-alone program. EH believes that integration of the FEOSH Program for EH

employees will be achieved by applying the integrated safety management (ISM) core functions and guiding principles as described in the Department of Energy (DOE) Publication 450.4, *Safety Management System Policy*:

Core Functions:

- o Define the Scope of Work
- o Analyze the Hazards
- o Develop and Implement Hazard Controls
- o Perform Work within Controls
- o Provide Feedback and Continuous Improvement

Guiding Principles:

- o Line Management Responsibility for Safety
- o Clear Roles and Responsibilities
- o Competence Commensurate with Responsibilities
- o Balanced Priorities
- o Identification of Safety Standards and Requirements
- o Hazard Controls Tailored to Work Being Performed
- o Operations Authorization

FEOSH Program requirements are established by statutes, regulations, and orders. By law (Section 19(a) of the Occupational Safety and Health Act of 1970, as amended), each Federal agency is required to develop and implement a safety and health program that is designed to protect its Federal employees from workplace hazards, illnesses, and injuries. Furthermore, each agency must identify a Designated Agency Safety and Health Official (DASHO) who is responsible for monitoring and reporting on the effective management and implementation of the agency's FEOSH Program(s) as required under the Act. The Assistant Secretary for Environment, Safety and Health is the DASHO for DOE for reporting purposes.

The requirements for the FEOSH Program are:

- o Section 19 of the *Occupational Safety and Health Act of 1970*, Public Law 91-596, 91st Congress, S. 2193, December 29, 1970
- o Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*
- o Title 29 Code of Federal Regulations, Part 1960 (29 CFR 1960), *Elements for Federal Employee Occupational Safety and Health Programs*
- o Title 10 CFR Part 835, *Occupational Radiation Protection*
- o Title 10 CFR Part 850, *Chronic Beryllium Disease Prevention Program*
- o DOE Order 440.1A, *Worker Protection Management for DOE Federal and Contractor Employees*
- o DOE Order 442.1, *Department of Energy Employee Concerns Program*
- o DOE P 450.4, *Safety Management System Policy*

Within DOE, line management is responsible and accountable for the safety and health of their employees. As such, each Headquarters organizational element, operations office, power marketing administration, or other field element is required to develop and implement their respective FEOSH Program. The Office of Safety and Health (EH-5) provides essential policy, guidance, and consultation to other departmental elements to effect consistent and compatible FEOSH programs throughout the Department.

3.0 APPLICABILITY

The policies and guidelines contained within this document apply to all EH personnel. EH line managers shall ensure that EH employees become familiar with this document and abide by its policies. Also, EH line managers shall ensure that contractors located in EH space and occasional visitors are afforded safe and healthful working conditions.

4.0 PROGRAM STRUCTURE

Four key elements must exist to implement an effective FEOSH Program for EH employees. These four program elements, described by the Department of Labor (DOL) in their *Safety and Health Program Management Guidelines*, January 26, 1989, are deemed consistent with DOE's ISM policy which we have chosen as the cornerstone of our safety and health program. The elements are:

- o management commitment and employee involvement;
- o workplace hazard analysis;
- o hazard prevention and control; and
- o safety and health training.

The following sections provide detailed discussions of these program elements.

4.1 Management Commitment and Employee Involvement

Management responsibility is one of the ISM guiding principles. DOE EH management commitment is critical to the successful implementation of the FEOSH Program for EH employees. In an effective program, management regards worker safety and health as a fundamental value to be pursued with as much vigor as other organizational goals.

EH employee involvement also is critical to the successful implementation of the FEOSH Program for EH employees. Employee involvement provides the means through which workers develop and/or express their commitment to safe and healthful practices for themselves and for their fellow workers.

4.1.1 EH Line Management Responsibilities

EH management is responsible for the overall integrity and implementation of the FEOSH Program for its employees. In order to implement an effective program,

EH management supports awareness activities; workplace inspections; investigation of safety and health concerns; hazard communication, abatement, and control; employee training; and other safety- and health-related initiatives. Managers and supervisors are responsible for the safety and health practices of their employees in their respective work areas and in the pursuit of their work activities when away from their assigned office. Furthermore, supervisors have the authority to remove an employee from their work area or to implement a stop-work mandate if they perceive a real or potential threat to the worker's health or safety or that of others.

Additionally, EH management, under the provisions of 29 CFR 1960, posts the responsibilities of both its managers and employees, the rights of employees and their representatives, and provides the name of the designated EH Safety and Health Program Manager, respective EH Units Safety and Health Program Coordinator, and the DASHO. This information is accurately summarized on the EH FEOSH Poster, and is on display where EH employees work and congregate. Title 29 CFR 1960 and other related documents are available to all EH employees on the FEOSH web site at <http://tis.eh.doe.gov/feosh/>.

EH managers also have certain responsibilities related to recordkeeping practices. EH Deputy Assistant Secretaries must identify a records coordinator who, jointly with the EH subject matter experts (Appendix A), will establish and implement recordkeeping procedures and identify where EH employee records will be maintained for the unit. In addition, all EH managers must ensure that records created from workplace inspections, hazard analyses and surveys, exposure monitoring and medical surveillance, worker process and procedure reviews, employee safety and health concerns, or other FEOSH-related activities are in accordance with DOE Order 440.1A and maintained in accordance with DOE Order 1324.5B, *Records Management Program*, and Federal confidentiality requirements. Records reflecting work area inspections, hazard analyses, employee concerns, and work practices must also be accessible to employees and their representatives upon request. EH employees may access their personal health record by contacting the Manager, Dependent and Health Care Services Program (MA-3), who is the manager of the Germantown and Forrestal Federal Employee Health Units.

4.1.2 EH Safety and Health Program Unit Coordinator Responsibilities

Each EH Deputy Assistant Secretary shall designate a FEOSH unit safety and health coordinator for the respective EH organizational unit. The unit safety and health representative shall perform his or her duties and responsibilities in accordance with the requirements in 29 CFR 1960. These unit representatives are expected to coordinate their responsibilities with the overall EH Safety and Health Program Manager. To ensure that all EH employees participate in FEOSH activities and are protected from unsafe and unhealthful working conditions, the

EH Safety and Health Program Unit Coordinator shall bear responsibility for the following aspects of the Program:

- o Administer the FEOSH Program activity for unit employees.
- o Ensures that required EH unit workplace inspections are conducted.
- o Targets safety and health activities in high-risk or identified problem areas.
- o Refers as appropriate or assists in any investigation of unit employee concerns and reports of unsafe/unhealthful working conditions.
- o Facilitates prompt abatement of occupational safety and health hazards, and monitors progress in the workplace of the unit.
- o Encourages unit employee participation and involvement.
- o Provides regular feedback to management concerning occupational safety and health hazards.

4.1.3 EH Unit Employee Rights and Responsibilities

All EH employees have rights as well as responsibilities in maintaining a safe and healthy workplace. EH employees have the right to:

- o Work in an environment that is safe and devoid of known occupational hazards and health risks.
- o Know what identified occupational hazards exist, and the corrective actions taken to eliminate or reduce those risks.
- o Stop work IMMEDIATELY without fear of reprisal, should a situation arise that puts them or a co-worker in immediate danger.
- o Report unsafe work conditions or practices to their supervisor, EH Safety and Health Program Unit Coordinator and their Deputy Assistant Secretary, the Office of Management and Administration (MA), the National Treasury Employees Union (NTEU), the Occupational Safety and Health Administration (OSHA), or any other appropriate authority, without fear of reprisal and receive timely notification when the issue is adequately resolved.
- o Request inspections of unsafe or unhealthful working conditions.

EH employee responsibilities go hand-in-hand with employee rights. Commensurate with the right to work in a safe and healthful environment is the responsibility to act in ways that promote safety. Specifically, employees must:

- o Comply with applicable FEOSH laws, and DOE safety and health implementing policies and directives.
- o When at remote facilities on official government travel, follow all site-specific policies and procedures (e.g., training requirements, use of personnel protective equipment, wearing dosimeters, etc.) that have been established by the respective DOE field offices or their operating contractors.

- o Know the location of, and the information contained on, the Material Safety Data Sheets for the chemicals contained in their designated work area.
- o Report recognized hazards to their immediate supervisor.
- o Stop work immediately if they perceive a real or potential risk of injury to either themselves or a co-worker.
- o Report work-related injuries or illnesses to their supervisor.

4.1.4 Reporting Employee Concerns and Hazards

Identification and reporting of potentially unsafe or unhealthful working conditions is the responsibility of all EH employees or their representatives. Conditions reported may include environmental, occupational safety- and/or health-related concerns or hazards, and facility-related issues. Since many conditions can be eliminated as soon as they are identified, an effective channel of oral or written communication is imperative in the development of a sound FEOSH Program for EH employees. Appendix B provides details of the EH Employee Concerns Program, including responsibilities and procedures, should initial actions taken to resolve an employee concern are felt to be inadequate by the employee.

4.2 Analysis of Hazards in the Workplace

Analysis of hazards is an ISM core function. EH managers and employees must analyze the hazards to EH employees at their normal work station and while on official travel.

Hazard analysis is a comprehensive process for identifying existing and potential workplace conditions that have the capability of causing employee injury or illness. The process helps to foster continuous improvement in safety and health, to ensure compliance with DOE and other Federal safety and health requirements, and to establish a safe work environment.

The following methods can be used to identify work-related hazards faced by EH employees in EH occupied space or while on official travel:

- o hazard analysis (e.g., job safety analysis and comprehensive safety and health surveys)
- o accident/incident investigations
- o routine self-assessment
- o inspections

Hazard analysis of a work activity can be conducted either informally or formally. Hazard identification is most effective when performed informally during the course of daily work activities by supervisory and non-supervisory employees and qualified safety and health professionals. Formal hazard analysis requires more planning and is accomplished by trained safety specialists experienced in recognizing hazards in specific work areas and activities. A formal hazard analysis usually includes job safety analysis, process hazard

analysis, comprehensive safety and health surveys, and investigations arising from employee concerns. The primary goal for identifying hazards in the workplace or activity is to determine why they exist so effective mitigating actions can be taken.

Accident investigation is a systematic search to uncover facts and details of a loss-producing event and to determine what recommendations and corrective actions are needed in order to prevent a recurrence.

Self-assessment is a systematic process of evaluating the effectiveness of safety and health policies and programs as well as the systems that support them. The most basic form of self-assessment is conducting daily walkthroughs of the workspace and regular review of work activities. Workers and supervisors can evaluate their own work areas and activities by periodically conducting informal safety inspections and reviews with the intent of identifying hazardous working conditions or activities. The ability to identify and correct noted deficiencies greatly enhances the benefit of performing a self-assessment.

Inspections of work areas help to improve employee safety and health. Types of inspections vary but usually fall into three main categories: periodic/annual, compliance-oriented, and employee concerns. In general, the objective of an inspection is to improve employee working conditions through systematic identification and subsequent abatement of hazards. Periodic inspections help to provide a continuous assessment of the work areas whereas compliance-based inspections usually target high-risk problem areas. Inspections in response to reported employee concerns evaluate the alleged unsafe or unhealthful working conditions. Conditions prompting the employee concern must be inspected within 24 hours for imminent danger situations, within 3 days for potentially serious allegations, and within 20 days for all other conditions.

Note: Since MA-211 is responsible for building maintenance and correction of related hazards for the Forrestal and Germantown facilities, as well as being the point-of-contact for the General Services Administration (GSA) leased space, the annual inspection of EH workspaces, as required by 29 CFR 1960, will be jointly performed by MA-211, the representative EH Unit Safety and Health Program Coordinator, and NTEU.

Notices of unsafe and unhealthful working conditions resulting from inspections, affecting EH employees and/or EH work areas, will be posted in accordance with requirements in 29 CFR 1960. EH management will also be informed of unsafe and unhealthful conditions affecting EH employees and/or EH work areas identified through internal DOE inspection activity, e.g., annual MA-211 FEOSH walkthrough. NTEU representatives will be advised on inspection findings and abatement plans, also in accordance with 29 CFR 1960.

The work-related hazards faced by the majority of EH employees fall into two main categories. The first category is hazards most commonly associated with an office environment. These include, but are not limited to, design of computer workstations,

uneven walking surfaces, use of electrical equipment, and office clutter. EH employees should follow the guidelines defined in section 4.1.4 and Appendix B of this document for reporting safety and health concerns and hazards.

The second category is hazards associated with performing site visits at DOE facilities and traveling outside the United States on official government travel. Unique hazards for EH employees traveling to other DOE facilities are the potential for exposure to radioactive materials or radiation generating devices and beryllium.

EH employees must comply with the requirements of 10 CFR 835, *Occupational Radiation Protection*, revised January 1, 1999. Specifically, EH managers and employees should consult Appendix D of this document before traveling to a DOE facility for activities that include potential exposure to radioactive materials or radiation generating devices.

EH managers and employees must comply with the requirements of 10 CFR 850, *Chronic Beryllium Disease Prevention Program*, published December 8, 1999, when an EH employee travels to a facility that presents the potential for exposure to airborne beryllium particles. Specifically, EH managers and employees must comply with EH's *Chronic Beryllium Disease Prevention Program (CBDPP) for EH Employees* which is contained in Appendix E of this document. Appendix F summarizes the procedures and responsibilities of the Headquarters CBDPP Medical Surveillance Program.

Prior to departure, all EH employees traveling outside the United States on official business should consult with the medical personnel of the Federal Employee Health Unit regarding Federal travel advisories, health precautions, and suggested immunizations to reduce the risk of travel-related illnesses or other health consequences of travel abroad.

4.3 Hazard Prevention and Control

Developing and implementing hazard controls is an ISM core function. EH managers and employees must prevent or control the real or potential hazards that are identified. Federal and DOE requirements for hazard abatement are found in 29 CFR 1960.30, 10 CFR 835, 10 CFR 850, and DOE Order 440.1A.

Employee safety and health should be considered during the earliest stages of facility design, work or activity planning, and travel. However, employees may face new and previously unpredicted hazards that must be corrected or abated as they arise. For hazards newly identified in the workplace or during a work activity, corrective actions must be prioritized according to worker risk. If a hazard cannot be corrected on the spot, then prompt interim protective measures must be taken prior to its final abatement.

Hazard prevention and control can be accomplished via:

- o engineering controls
- o work practice controls

- o administrative controls
- o preventative maintenance
- o emergency preparedness
- o personal protective equipment
- o occupational medical programs

An important element of a hazard prevention and control program is employee safety and health awareness. EH employees may gain basic safety and health information about their office environment while reviewing Module 3 of the *FEOSH Orientation*, located on the FEOSH web site, Pubs and Reports page (<http://tis.eh.doe.gov/feosh/>). Module 3, “Recognizing and Preventing Hazards in the Workplace,” focuses on providing EH employees with tips on recognizing, preventing, and eliminating common workplace-related hazards. Examples of hazards covered in the module are electrical, fire, chemical, and housekeeping. Module 3 also provides employees with general information on how to adjust their computer workstation to make it more ergonomically aligned. The EH Safety and Health Program Manager can also provide additional information and guidance on these and other safety and health-related topics.

EH employees need to prevent hazards where they can. For example:

1. Prior to travel, know the scope of work that is expected of you, and the need for training, monitoring, personal protective equipment, and medical clearance.
2. If travel is outside the United States, contact the Headquarters Federal Employee Health Unit about specific health precautions, travel advisories, and need for immunizations, that are recommended by the World Health Organization and the Centers for Disease Control.
3. During DOE-related travel, if an EH employee has a medical/health examination in order to obtain a “clearance” to perform his or her assigned duties (e.g., respirator clearance), a copy of the examination/clearance form should be forwarded to the Headquarters Federal Employee Health Unit.
4. If an EH employee is the subject of exposure monitoring during DOE-related travel, the exposure monitoring data should be forwarded to the EH unit records coordinator or subject matter expert, as appropriate.

At any time, if an EH employee becomes aware of a previously unidentified hazard or perceives a risk of potential injury or exposure to chemical, ergonomic, or physical (including radiological) hazards, they should notify their supervisor immediately. If the risk of bodily harm is great, they should stop work until a safety or health specialist can evaluate the offending hazard. If the hazard is facility-related, whether the building is Headquarters or GSA-leased, the procedures in Section 4.1.4, *Reporting Employee Concerns and Hazards*, should be followed.

Appendix A provides a listing of EH subject matter experts that can be contacted to provide additional information on specific hazards.

4.4 Safety and Health Training

Competence commensurate with responsibilities is an ISM guiding principle. All EH employees must have the needed skills to perform their tasks in a safe and healthful manner. Beyond a generalized safety and health orientation, all other training should focus on helping the employee meet their environment, safety, and health performance requirements, satisfy DOE, EH, and other regulatory requirements, and allow for future professional growth.

Safety and health training can be delivered through a variety of methods. Examples are:

- o orientation sessions that provide a general awareness of a specific topic;
- o formal classroom style including courses, seminars, conferences, and expositions devoted to a more in-depth training in a specific topic; and
- o approved on-the-job training for skill-related activities where hands-on operations are performed.

If training has been successful, employees will display their acquired safety and health knowledge through:

- o exhibiting a thorough knowledge of their rights, roles, and responsibilities;
- o reporting worksite incidents and accidents;
- o identifying and reporting real or potential worksite and work activity hazards; and
- o using appropriate safeguards in the performance of their assigned duties.

As previously stated in this document, a comprehensive orientation to the FEOSH Program and basic safety and health training is available to all EH employees on the FEOSH web site, Pubs and Reports page, *FEOSH Orientation* at <http://tis.eh.doe.gov/feosh/>. EH employees should consult with their training coordinators on the availability of other in-house or contractor-sponsored safety and health training. Also, DOE Program Office and Field Office safety and health program managers may be contacted regarding training that is specific to hazards that may be encountered while visiting a DOE facility.

EH employees shall have an initial training session in the basic elements of 29 CFR 1960, including hazard recognition and awareness involving typical safety and health subjects encountered in EH-occupied work areas and DOE sites when visiting on official business. Refresher training shall be conducted every 2 years. Also, training shall be provided to newly hired EH employees, and to those employees that are reassigned to another position within EH, if that position involves more hazardous working conditions.

EH employees should consult their immediate supervisor if at anytime they do not have the skills or knowledge to perform an assigned task in a healthy or safe manner.

4.5 Program Evaluation

Title 29 CFR 1960.79 requires that FEOSH Program self-evaluations be developed and implemented. The designated overall EH Safety and Health Program Manager shall conduct an annual EH programmatic review using the FEOSH Program Self-Assessment and Program Evaluation document for all EH units. The Safety and Health Program Manager shall enlist the assistance of the designated EH unit safety and health coordinators for their respective unit in this effort. The document is available on the EH web site. Results of all inclusive EH Program reviews, as well as reviews from all other departmental FEOSH Programs, will be used to prepare the annual DOE report on occupational safety and health program to the Secretary of Labor, as required by 29 CFR 1960. The Deputy Assistant Secretary for Safety and Health shall prepare this report on behalf of the DASHO and may request, as appropriate, information from all Department organizations to complete the annual report.

EH-5 also will be the lead agent in the Department to track and report DOE's performance in achieving the goals and objectives of the Federal Worker 2000 Presidential Initiative.

Pursuant to Executive Order 12196, OSHA may conduct independent program evaluations or unannounced inspections of Federal workplaces. It is EH's policy to cooperate with OSHA compliance personnel and seek their assistance in improving EH Federal workplace safety and health.

APPENDIX A

Environment, Safety and Health (EH) Subject Matter Experts

Below is a listing of the EH subject matter experts who can provide management, employees, and employee representatives with additional information on specific hazards.

Beryllium	Jackie Rogers	301-903-5684
Chemical Safety	Gail Kleiner	301-903-5601
Construction Safety	Pat Finn	301-903-9876
Electrical Safety	Pat Tran	301-903-5638
Ergonomics	Carlos Coffman	301-903-6493
Fire Protection	Jim Bisker	301-903-6542
Industrial Hygiene	Dave Pegram	301-903-9840
Nuclear Safety	Mary Haughey	301-903-2867
Medical Surveillance	Marvin Mielke	301-903-7362
Radiation Protection	Peter O'Connell	301-903-5641
Respiratory Protection	Dan Marsick	301-903-3954
Toxicology	David Weitzman	301-903-5401
Designated S&H Program Mgr.	Joe Hopkins	301-903-5619

For additional information on the Department of Energy (DOE) Employee Assistance Program, contact Mr. Bill Woods, Employee and Labor Relations Division (MA-353), on 202-586-4995.

The EH Portal is a valuable web site source for obtaining employee environment, safety and health (ES&H) information across the complex. Employees can access this web site at <http://tis.eh.doe.gov/portal/>. Below is a partial listing of the information available on the EH Portal:

- o Latest ES&H News
- o ES&H Weekly
- o Integrated Safety Management Update
- o ES&H Knowledge Management Tools (includes the following)
 - Integrated Safety Management facts and guidance
 - ES&H web sites by subject matter
 - ES&H orders, standards, and rules
 - ES&H document collections
 - ES&H training across the complex
 - Related sites

APPENDIX B

Office of Environment, Safety and Health (EH) Employee Concerns Program

Purpose

This appendix establishes procedures within EH necessary to resolve environmental, and occupational safety and health concerns or hazards, and facility-related issues reported by EH employees or their representatives. It also addresses the appeals process in the event the concern originator is dissatisfied with the resolution of his/her concern.

It is the intent of the EH Employee Concerns Program to maintain the identity of the originator of any concern as confidential. This is done to protect the employee against acts of reprisal. Individuals are encouraged to contact their immediate supervisors to address issues and discuss solutions before using the EH concerns process described in this appendix. The concern originator also has the right to report unsafe and unhealthful working conditions to the Occupational Safety and Health Administration (OSHA), the National Treasury Employees Union (NTEU), or other entities as appropriate.

The EH Employee Concerns Program is not designed to process allegations of waste, fraud and abuse, or personnel issues, as there are other established mechanisms to address such matters.

Applicability

The EH Employee Concerns Program is available to anyone working within EH, including employee representatives, to submit issues for resolution. Once received by the EH Employee Concerns Program Coordinator, the issues are processed as described in this appendix.

The concerns processing system allows for evaluation and processing of concerns which EH management decides should be handled by EH. Non-EH environmental, and occupational safety and health concerns or hazards received by EH personnel via facsimile, letter, or electronic mail shall be forwarded to the EH Employee Concerns Program Coordinator, who shall direct them to the respective Program or Field Office Employee Concerns Manager or any other appropriate authority.

Definitions

Facility-Related Concerns: Concerns involving facility management and building maintenance issues where abatement or corrective actions are the responsibility of the Engineering and Facilities Management Services Group (MA-211), Office of Management and Administration. These concerns may include indoor air quality, fire protection, furniture, lighting, building electrical wiring, walking and working surfaces, and potential release of pollutants into the environment.

Environmental, and Occupational Safety and Health Concerns: A declaration or statement about the existence of potential hazards associated with the environmental, and occupational safety and

health aspects of an activity, including Federal Employee Occupational Safety and Health (FEOSH) programmatic issues. These concerns may include lack of proper personal protective equipment; defective equipment or materials; improper ergonomic working conditions; inadequate training; and illness due to exposure to a hazardous condition.

Concern Originator: Employees who submit a concern to the EH Employee Concerns Program for resolution.

Responsibilities

The Assistant Secretary for Environment, Safety and Health:

- o has overall responsibility for the management of the EH Employee Concerns Program;
- o designates the EH Employee Concerns Program Coordinator;
- o reviews for approval of the evaluation report and recommended corrective actions, and an independent investigation report and recommended actions generated by the Deputy Assistant Secretary of the originator's organization; and
- o reviews for approval of the Appeals Review Panel report and recommended corrective actions.

The Deputy Assistant Secretary for Oversight:

- o assists the Deputy Assistant Secretary of the originator's organization in quickly resolving concerns in situations in which an EH employee has stopped working on a task where there is reasonable belief that the task presents an imminent danger; and
- o upon request, assists the Deputy Assistant Secretary of the originator's organization in other than imminent danger situations.

The EH Employee Concerns Program Coordinator:

- o reviews, assigns and coordinates employee concerns for processing and resolution, in accordance with EH-1 procedures;
- o records and logs concerns assigning appropriate identification numbers;
- o ensures that all files and records related to the EH Employee Concerns Program are maintained, organized, and secured to maintain confidentiality;
- o ensures tracking of concerns and issues through the Deputy Assistant Secretary for Oversight annual status reports to the Assistant Secretary;
- o takes necessary steps to ensure that EH employees are updated on the EH Employee Concerns Program every 2 years;
- o helps maintain confidentiality of concern originators, when applicable;
- o notifies the originator of the actions taken to resolve the issue; and
- o interfaces with the Assistant Secretary, the Deputy Assistant Secretary of the originator's organization, Deputy Assistant Secretary for Oversight, the concern originator's supervisors, and the concern originator to facilitate issue resolution, as needed.

The Concerns Originator:

- o first reports concerns to the supervisor or the EH Unit Safety and Health Coordinator;
- o if not satisfied, reports concerns to the EH Employee Concerns Program Coordinator; and
- o if the environment, safety, and health concern represents a potential imminent danger, takes immediate action to mitigate the effects of the hazard or removes him/herself and other employees from the hazard.

Required Information when Reporting a Concern

Any EH employee or employee representative submitting a concern to the EH Employee Concerns Program Coordinator should provide the following information:

- o reason for report: environmental, safety and health, or facility-related concern;
- o EH organization of the employee;
- o specific location of the concern;
- o description of the concern;
- o action taken by the employee or employee representative and the immediate supervisor to correct the condition (if known); and
- o employees who wish to remain anonymous shall so indicate on the written report.

Facility-Related Concerns

Individuals are encouraged to first seek to resolve concerns with their immediate supervisors. If the concern or hazard is Headquarters facility-related, EH employees or their supervisors should immediately report it either orally or in written form to the Headquarters Safety and Health Manager, Engineering and Facilities Management Services Group (MA-211), Office of Management and Administration (MA).

MA-211 is the point-of-contact for facility and maintenance issues for the Forrestal and Germantown Headquarters and General Services Administration leased buildings (e.g., 270 Corporate Center). Generally, MA-211 resolves facility-related issues within the following time frames:

Imminent:	within 24 hours
Serious:	within 3 working days
Other-than-serious:	within 20 working days

EH employees or their supervisors should use the following phone numbers to report facility-related concerns:

Washington D.C. area or the Forrestal Building	(202) 586-6080
Germantown area or the Germantown campus	(301) 903-7050

If MA does not respond orally or verbally to the EH employee or supervisor within the above specified time frames, the employee or his/her supervisor should contact their respective EH Unit Safety and Health Coordinator, at (301) 903-5619. The EH Unit Safety and Health Coordinator will seek resolution of the facility-related hazard or concern through coordination with MA or contacting the EH Employee Concerns Program Coordinator.

Environmental, and Occupational Safety and Health Concerns

If the issue or concern does not appear to be facility-related, and the EH employee needs help in determining a course of action and resolution of the concern, the employee first should notify the immediate supervisor or the EH Unit Safety and Health Coordinator.

If the EH employee is dissatisfied with the resolution of his or her concern through discussions with the immediate supervisor or EH Unit Safety and Health Coordinator, the EH employee should then contact the EH Employee Concerns Program Coordinator. The EH Employee Concerns Program Coordinator, as well as the immediate supervisor, shall ensure that the procedures of this appendix are appropriately met. The EH Employee Concerns Program Coordinator also interfaces with the Director, Office of Employee Concerns (ED-5), with respect to requirements of the Department of Energy (DOE) Order 442.1, *Department of Energy Employee Concerns Program*. EH employees should become familiar with the procedures and requirements outlined in DOE Order 442.1.

The following procedure should be followed to resolve EH employee environment, safety, and health concerns:

- o Once the environment, safety, and health concern is appropriately logged, the EH Employee Concerns Program Coordinator notifies the Deputy Assistant Secretary of the originator's organization, who determines the significance of the concern in coordination with the EH Employee Concerns Program Coordinator.
- o If a concern is a situation in which an EH employee has stopped working on a task because of a reasonable belief that the task presents an imminent danger, the Deputy Assistant Secretary of the originator's organization may consult with the Deputy Assistant Secretary for Oversight, for assistance to initiate a prompt investigation of the situation and recommend an appropriate action that should be taken within 24 hours. Work stoppage and restart procedures shall be conducted in accordance with DOE O 440.1A, DOE G 440.1-1, and DOE Manual 411.1-1, *Manual of Safety Management Functions, Responsibilities, and Authorities* (FRAM).
- o If the condition does not present an imminent danger situation, the Deputy Assistant Secretary of the originator's organization shall:

1. Request assistance, if needed, for evaluating or resolving the concern from the Deputy Assistant Secretary for Oversight. Potentially serious environment, safety, and health conditions shall be investigated within 3 working days.
2. Within 5 working days of logging the concern, acknowledge to the concern originator through the EH Employee Concerns Program Coordinator, receipt of the concern including actions that will be taken.
3. Within 30 working days of logging the concern, submit to the EH Assistant Secretary for final approval an evaluation of the concern and recommended corrective actions, including an investigation report and recommended corrective actions.
4. Forward the approved report and corrective actions to the responsible supervisor for action. The approved report and corrective actions shall also be distributed to the concern originator through the EH Employee Concerns Program Coordinator.
5. Forward the documentation of completion of corrective actions to the EH Assistant Secretary and concern originator through the EH Employee Concerns Program Coordinator for appropriate closure of the concern.

o Appeals Process

If the concern originator is dissatisfied with the assessment of the concern by the EH Assistant Secretary, or with actions taken to abate the concern, he/she shall be encouraged to confer with the responsible Deputy Assistant Secretary, immediate supervisor, EH Safety and Health Program Manager and/or employee representative. If, after this discussion, the originator remains dissatisfied, he/she may appeal the determination. The appeals process shall be conducted as follows:

1. The appeal shall be in writing, submitted to the EH Employee Concerns Program Coordinator, and contain at least the following information:
 - a. A description of the concern (a copy of the original concern should be sufficient).
 - b. How, when, and to whom the original report of the concern was submitted.
 - c. What actions were taken as a result of the original report.
2. The EH Employee Concerns Program Coordinator:
 - a. Ensures that the issue is logged.
 - b. Maintains the confidentiality of the originator of the appeal, as appropriate.
 - c. Notifies the Deputy Assistant Secretary for the originator's organization who will coordinate the establishment and selection of a Review Panel, in accordance with DOE Order 442.1.

3. The Review Panel:

- a. Consists of personnel with expertise related to the issue and who are sufficiently independent from the issue being evaluated.
- b. Conducts an evaluation of the issue, documents its conclusions and proposes a disposition that either addresses a resolution with recommended actions, or provides justification for dismissal of the issue.
- c. Submits the proposed disposition to the Deputy Assistant Secretary of the originator's organization for a decision.

4. The Deputy Assistant Secretary of the originator's organization:

- a. Makes a decision on actions to be taken in accordance with recommendations by the Review Panel.
- b. Submits for concurrence to the EH Assistant Secretary the results of the decision.
- c. Provides a copy of the final disposition to the concern originator, through the EH Employee Concerns Program Coordinator, within 20 working days of logging the appeal. A copy of the final disposition is also submitted to the responsible supervisor for action, as appropriate, and to the EH Employee Concerns Program Coordinator to complete related file documentation.
- d. If the originator is not satisfied with the disposition as a result of the appeals process, he/she may contact the OSHA, the NTEU, or any other entity, as appropriate.

APPENDIX C

Common Workplace Hazards

As the majority of Environment, Safety and Health (EH) employees work in an office environment, the following is a listing of the most commonly occurring hazards found in this setting. The intent of listing the most common workplace hazards is to raise awareness and to ultimately provide EH employees protection against injury. Remember that the listing is not designed to be all-inclusive.

When visiting the Department of Energy (DOE) and DOE contractor facilities, EH employees must abide by site-specific safety and health programs. While on travel, if an EH employee has questions about worksite hazards, personal protective equipment, or safety and health protocols, contact the site safety and/or health personnel for guidance.

EH employees should contact their supervisor, the EH subject matter experts listed in Appendix A of this document, or the EH Safety and Health Manager, in sequential order, should they need further direction or consultation concerning these or other work-related hazards.

o Electrical Hazards

Most offices contain a considerable amount of electrical equipment such as computers and small appliances like coffee makers, toasters, heaters, and fans. Caution should be used in setting up electrical equipment so as to prevent circuit overload and tripping hazards. Never daisy chain electrical/extension cords. Organize the office space so that cords are not crossing aisles or walkways. Before setting up electrical equipment, always inspect the integrity of the cord and appliance itself. If an electrical appliance appears faulty, stop using it immediately, unplug it and remove it from service, tag it as "non-operational," and report it to your supervisor. Always use an electrical appliance for its intended purpose only.

o Fire Safety

Every EH employee is responsible for promoting fire safety. Reporting real or potential fire hazards and ensuring those hazards are corrected are necessary actions that help to eliminate the risk of a fire. If a perceived fire hazard cannot be corrected on-the-spot, report it to your supervisor and facility management immediately. Keep work areas, exits (internal and external), and hallways free of clutter. Know the correct evacuation route from your work area.

o Ergonomics

Computer workstation and other office equipment should be configured to the comfort of the user. Position computer monitors so the top of the screen is at or below eye level. Chairs should be adjustable and provide support to the lower back and upper extremities. When seated, feet should either rest on the floor or on a footrest. If in doubt of the correctness of your computer

workstation design or if you are experiencing ill-health effects possibly because of it, report it to your supervisor and contact the EH Unit Safety and Health Manager to schedule an ergonomics evaluation. If health effects persist, consult the Federal Employee Health Unit.

o Bloodborne Pathogens

In the event of an accident, EH employees may need to administer first aid to a co-worker, thereby putting themselves at risk of exposure to blood or other body fluids. If providing first aid where blood or body fluids are present, employees should wear gloves or use a barrier (absorbent cloths topped with a plastic liner) to help reduce their risk of exposure. Washing hands vigorously with soap and water immediately following an exposure will also help to eliminate possible health risks. Employees need to report any such exposure to their supervisor and consult with the Federal Employee Health Unit as soon as possible.

o Violence in the Workplace

Workplace violence or other type of unprofessional physical or verbal conduct will not be tolerated within EH. This type of behavior may result in disciplinary action, including termination of employment. As with any other type of workplace hazard, EH employees are responsible for reporting incidents of this nature to their supervisor. The occurrence of employee violence should also be reported to the EH Safety and Health Manager and the Office of Employee Concerns (ED-5) on (202) 586-6530. At any time, if the threat of bodily harm is apparent, EH employees should immediately call building security or “911” to report the incident to local law enforcement authorities.

o Housekeeping

Clean, uncluttered, and organized work areas help minimize office-related accidents and employee injuries. Proper storage of paperwork, work materials, and equipment will also help the overall professional appearance of the work area. Discarding or archiving no longer needed documents/articles, regular cleaning and vacuuming, and avoiding fluid spills on carpeting and upholstered surfaces will support good indoor air quality and the overall safety and health of the work environment.

APPENDIX D

Radiation Protection for Environment, Safety and Health (EH) Employees

Because radioactive materials or radiation generating devices can be found at most Department of Energy (DOE) sites, a Federal employee visiting a DOE site, in many cases, may have to prepare for possible exposure to radiation or radioactive material. Under the system of radiation protection established by title 10 Code of Federal Regulation, part 835 (10 CFR 835), a site performing an activity that could result in exposure of an individual or individuals to ionizing radiation is responsible for establishing a program to protect that individual from the effects of ionizing radiation. While the site is responsible for protecting all visitors to the site, it is prudent for Federal employees visiting the site to determine if there are any actions that should be taken in advance to meet site radiation protection requirements. In this way, time can be devoted most effectively to meeting the objectives of the visit. The following sections address aspects of radiation protection that should be considered before visiting a DOE site.

1. Training.

Training is required for unescorted access in the Controlled and Radiological areas of DOE sites. Thus, a site visitor needs to determine what areas of a site will be entered during the visit, and make arrangements for obtaining either training appropriate to the radiological hazard in those areas or a qualified escort. Training on core or generally applicable aspects of radiation protection is periodically available to Federal employees at DOE Headquarters. Training that is specific to a DOE site must be obtained at that DOE site.

2. Radiation Dose Monitoring.

Depending upon which area of a site is to be visited, personnel visiting a site may either be monitored for internal or external exposure to radiation. In most cases the visitor does not have to take any actions before the visit to be monitored for internal or external exposure to radiation. However, some sites may require a whole body count (a determination of internal radiation exposure by using detectors on the outside of the body) before permitting a person to enter an area where internal radiation exposure monitoring is required. The whole body count should be arranged before the visit. In addition, it is a good practice for site visitors to know their current radiation dose for the year, particularly if they have received more than 50 millirem (mrem) during the current year or if they are going to receive any significant amount of radiation dose as a result of the site visit. DOE Headquarters Federal employees are periodically provided records of their radiation dose from visits to DOE sites where they have been monitored.

3. Protective Equipment.

For entry into areas of the site controlled because of the presence of contamination and airborne radioactive material, personal protective equipment such as anti-contamination clothing (anti-Cs) is always required and respiratory protection may be required. Typically, no advance preparations are needed for anti-Cs; however, it may be helpful to obtain training in

putting on and taking off protective clothing if a full set of anti-Cs will be needed to visit a part of the site. This training is typically included in the training needed to gain access to areas that are controlled because of the presence of contamination or airborne radioactive material. If respiratory protection is needed as part of the site visit, the visitor must meet site requirements concerning respirator training, respiratory protection medical examination, and fit testing of the respirator. If the site agrees, the medical examination and training can be obtained at Headquarters before the visit. The fit test of the respirator must be performed on site and arrangements should be made before the visit to schedule a fit test upon arrival.

4. Records.

As can be seen above, it is a good practice to maintain current records of radiation dose monitoring, medical exams related to respirator use, and radiological training if a Federal employee plans routinely to visit DOE sites where exposure to contamination and airborne radioactive material is possible. The records coordinator of the EH employee's organization will identify where the records are maintained. Radiation dose monitoring results should be part of the Federal employee's occupational medical file. If provisions do not exist to have these records automatically incorporated into a Federal employee's medical file, the employees should personally forward copies of the monitoring records to their Headquarters health unit.

APPENDIX E

Chronic Beryllium Disease Prevention Program (CBDPP) for Environment, Safety and Health (EH) Employees

Title 10 Code of Federal Regulations, part 850 (10 CFR 850), *Chronic Beryllium Disease Prevention Program*, published December 8, 1999, requires that responsible employers must implement a program to manage and control worker beryllium exposures in order to reduce the number of workers exposed and to ensure the early detection of chronic beryllium disease. EH employees may conduct activities at the Department of Energy (DOE) facilities that present the potential for exposure to airborne beryllium particles. The Assistant Secretary for Environment, Safety and Health is the responsible employer for these EH employees. This appendix is EH's CBDPP, as required by 10 CFR 850, for EH employees who conduct activities at DOE facilities that present the potential for exposure to airborne beryllium particles.

1. General Requirements.

EH managers and employees must comply with the Federal Employee Occupational Safety and Health (FEOSH) Program for EH Employees (this document) while visiting DOE facilities that may pose a risk of exposure to airborne beryllium particles.

Affected EH Deputy Assistant Secretaries (DAS) must designate a CBDPP point-of-contact to assist managers and employees, as well as the DAS, in implementing the CBDPP for EH employees in their organization, and keeping track of CBDPP documentation and records.

EH managers must, in giving assignments to EH employees, assure that the employees' exposures will be at or below the action level; that the number of EH employees exposed and potentially exposed is minimized; that the opportunity for exposure to these employees is minimized; and that these employees' disability and lost work time due to beryllium disease, sensitization, and associated medical care is minimized.

EH managers must set goals for, and keep track of, these employees' exposures and potential exposures, and beryllium-related medical status, to further reduce exposures below the action level established by 10 CFR 850. By July 1, 2001, and then by January 7 of each year thereafter, affected EH DASs must submit to the EH Assistant Secretary an analysis of their EH employees' exposures and potential exposures, and beryllium-related medical status, and a proposal for exposure reduction and minimization goals for the ensuing year.

2. Program at Facility to be Visited.

EH employees must comply with the CBDPP of the facility to be visited. EH managers must obtain and review with the employee the facility's CBDPP to ensure that the employee is, or will be, in compliance when the activity involving beryllium begins.

3. Specific Program Requirements.

Many of the specific program requirements of 10 CFR 850 do not apply to EH as the responsible employer due to the type of job activities performed by EH employees, e.g., oversight activities.

For example, the requirements to conduct a baseline beryllium inventory (10 CFR 850.20) and to establish regulated areas (10 CFR 850.26) do not apply to EH because beryllium is not used in EH offices.

EH managers and employees complying with the specific requirements of a DOE-approved CBDPP plan of a facility being visited will be in compliance with the specific requirements of 10 CFR 850, Subpart C. These requirements include, but are not limited to sections 850.22 (permissible exposure limit), 850.23 (action level), 850.24 (exposure monitoring), 850.25 (exposure reduction and minimization), 850.26 (regulated areas), 850.27 (hygiene facilities), 850.28 (respiratory protection), 850.29 (protective clothing and equipment), 850.37 (training and counseling), and 850.38 (warning signs and labels).

EH managers must comply with the requirements of sections 850.28 (respiratory protection), 850.34 (medical surveillance), 850.35 (medical removal), 850.36 (medical consent), 850.37 (training and counseling), and 850.30 (beryllium registry) by utilizing the services of the employee's Headquarter health unit. The Headquarter health unit (MA-353) is prepared to support EH in providing the services needed for managers to comply with the requirements of sections 850.34-36, 850.37, the respirator fit testing requirement of section 850.28, and the counseling requirement of section 850.37. Where funding is an issue for MA, EH managers may be required to provide the necessary funding, or make alternate arrangements, to ensure that employees are provided these services. When appropriate, EH managers must arrange for reciprocity with the facility being visited by the employee, to accept the medical services (e.g., physical, respirator fit testing, etc.) provided by the Headquarter health unit.

All records generated as a result of the requirements of 10 CFR Part 850 must be maintained by the employee's Headquarter health unit for inclusion in the employee's medical surveillance program records. EH managers must arrange for exposure results to be sent to the employee's Headquarter health unit for inclusion in the employee's medical surveillance record.

EH managers must comply with 850.39 (performance feedback) by conducting periodic analyses and assessments of the monitoring results, medical surveillance, and exposure reduction and minimization data obtained (without personal identifiers) from the employee's Headquarter health unit.

APPENDIX F

Occupational Health Medical Surveillance Program

The Dependent and Health Care Services Program has established medical surveillance protocols for a Headquarters Occupational Health Program to ensure the early detection of disease for workers who are exposed or potentially exposed to toxic and hazardous substances in the workplace.

Chronic Beryllium Disease Prevention Program (CBDPP) for Headquarter Employees

The CBDPP will enhance, supplement and be integrated into the existing Headquarters Occupational Health Program for the Department of Energy (DOE) Headquarters employees. This program is being structured in this manner to: (1) take advantage of the existing comprehensive medical surveillance program already implemented at DOE Headquarters; and (2) minimize the burden on DOE managers by clarifying that managers need not establish redundant medical surveillance programs to protect employees from occupational exposure to beryllium.

The CBDPP is designed to reduce the number of workers exposed to beryllium, minimize the levels of and the potential for exposure to beryllium, establish medical surveillance requirements to ensure early detection of the disease, and to improve the state of information regarding chronic beryllium disease and beryllium sensitization for Headquarters employees.

Specific CBDPP Requirements

Many of the specific program requirements of 10 CFR 850, CBDPP, do not apply to a Headquarters manager as the responsible employer due to the type of job activities performed by Headquarters employees (e.g., oversight activities).

The Headquarters health unit will provide services needed for Headquarters managers to comply with the program requirements of sections 850.34 (medical surveillance), 850.35 (medical removal), 850.36 (medical consent), 850.30 (beryllium registry), the fit testing requirement of section 850.28 (respiratory protection), and the counseling requirement of section 850.37 (training and counseling).

The Headquarters health unit will assist EH managers in arranging for reciprocity with the facility being visited by the employee, to accept the medical services (e.g., physical, respirator fit testing, etc.) provided by the Headquarter health unit.

The Headquarters health unit will maintain all records generated as a result of 10 CFR 850, for inclusion in the employee's medical surveillance program records. Headquarters managers must arrange for exposure results to be sent to the Headquarters health unit for inclusion in the employee's medical surveillance program records.

For any reason, if EH employees are unable to perform their normally assigned duties for medical or health reasons, whether the cause is occupationally related or not, they should notify their supervisor immediately. It may also be advisable for the employee to contact the medical staff at the Federal Employee Health Unit, located at both Germantown and Forrestal facilities.

APPENDIX G

EH Respirator Program

The requirements for the EH Respirator Program are outlined in the OSHA 29 CFR 1910 General Industry Standards, 29 CFR 1926 Construction Standards, and American National Standards Institute (ANSI) Standard Z88.2, American National Standard for Respiratory Protection (currently under revision). The following guidelines apply only to EH Federal employees.

Written Program

This program shall be maintained by the designated Respiratory Protection Program Administrator in conjunction with the Headquarters Federal Employee Occupational Safety and Health (FEOSH) Program. It will be made readily available to all who wear respirators.

Hazard Assessment

Before wearing a respirator, a hazard assessment at the proposed workplace should be performed. It is assumed that if a Site requires a DOE-HQ Federal employee to wear a respirator, such an assessment should have been done and documented, according to the OSHA Standard and ANSI Z88.2.

Medical Evaluation

Where possible, medical evaluation for EH Federal employees will be done through the Headquarters Health Unit (following ANSI Z88.6, Respirator Protection - Respiratory Use - Physical Qualifications for Personnel (currently under revision)). A written certificate shall be issued and should be acceptable at most field sites. When necessary, field sites may administer medical evaluations (following ANSI Z88.6), in lieu of the Headquarters Health Unit.

Training

All those wearing respirators must receive proper training according to the OSHA Standard and ANSI Z88.2. These training elements presently include:

- o why the respirator is necessary and how improper fitting, usage, or maintenance can compromise the protective effect of the respirator;
- o what are the limitations and capabilities of the respirator;
- o how to use effectively the respirator in emergency situations, including situations in which the respirator malfunctions;
- o how to inspect respirator seals;
- o what are the procedures for maintenance and storage of the respirator;
- o how to recognize medical signs and symptoms that may limit or prevent the effective use of respirators;
- o proper donning and doffing; and
- o when to change a cartridge.

Routine inspection, maintenance, storage, cleaning and disinfecting should be the responsibility of the issuer, usually the field Site. The wearer is responsible for inspecting his respiratory equipment prior to and after its use. Such inspection could include cleanliness of the respirator, torn or loose straps, holes in the filter, broken or loose fittings, cracked or scratched face pieces, and missing parts.

Selection

All respirators and air-supplied suits will be NIOSH-approved or approved under the DOE Respirator Acceptance Program. In most cases, the site provides the needed respiratory equipment.

Fit Testing

Fit testing should preferably be done at the Site, using the OSHA Standard protocol and Site-preferred respirators. In exceptional circumstances, the Headquarters Respiratory Program Administrator will arrange fit testing using a common respirator brand. Beards, low hairlines, glasses or goggles, and stubble may prevent proper user seal on a respirator. Quantitative fit testing is preferred. Fit testing must be done annually or more often as required by facial changes. Respirator pressure tests should always be done by the worker before entering a hazardous atmosphere.

Program evaluation of the Headquarters Respiratory Protection Program should be conducted once a year.